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19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA**

21 **SAN FRANCISCO DIVISION**

22 IN RE: UBER TECHNOLOGIES, INC.,
23 PASSENGER SEXUAL ASSAULT
24 LITIGATION

25 This Document Relates to:

26 ALL ACTIONS

27 Case No. 3:23-md-03084-CRB

28 **DEFENDANT UBER TECHNOLOGIES,
INC., RAISER, LLC, AND RAISER-CA,
LLC'S BRIEF IN SUPPORT OF UBER'S
PRIVILEGE CLAIMS CHALLENGED BY
PLAINTIFFS FOR THE JILL
HAZELBAKER CUSTODIAL FILE –
PURSUANT TO SPECIAL MASTER
ORDER NO. 3 (DKT. 2472)**

1 Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in
 2 support of their position on the remaining privilege challenges for custodian Jill Hazelbaker. On
 3 March 25, 2025, Plaintiffs challenged 20 documents within this custodial file. On April 17, 2025,
 4 Plaintiffs challenged an additional 8 documents within this custodial file from privilege logs served
 5 after March 24, 2025, bringing the total number of challenged documents to 28. Through conferrals,
 6 the parties have narrowed their dispute to 12 challenges. These challenges are now submitted for the
 7 Special Master's review.

8 In preparing documents for the Special Master's review, Defendants identified one document
 9 that requires additional redactions: JCCP_MDL_PRIVLOG080005. In addition to the existing
 10 redactions, Defendants intend to redact privileged and non-relevant content from slides regarding
 11 "Antitrust Updates" and "Antitrust Proceedings," as they reflect legal advice from in-house counsel,
 12 as described on Defendants' privilege log entry for this document. Defendants will reproduce the
 13 document with corrected redactions and will make that version available for the Special Master's
 14 review as soon as possible.

15 Defendants incorporate by reference the legal standard and arguments set forth in their prior
 16 briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the
 17 applicable legal standard, and the factual material previously provided to the Special Master,¹ when
 18 reviewed in conjunction with the challenged documents and the associated metadata fields, support
 19 Uber's privilege and work product assertions. The remaining privilege claims submitted for the
 20 Special Master's determination should be upheld.

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 26 ¹ As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in
 27 disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and (3)
 a digest of third-parties present in its privilege log. Defense counsel will also be available for any
 28 questions the Special Master may have during the review process.

1 DATED: April 28, 2025

Respectfully submitted,

2 **SHOOK HARDY & BACON L.L.P.**

3 By: /s/ Jennifer Hill

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